

1 BRIAN J. STRETCH (CABN 163973)  
Acting United States Attorney

2 DAVID R. CALLAWAY (CABN 121782)  
3 Chief, Criminal Division

4 PHILIP KOPCZYNSKI (NYBN 4627741)  
Special Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055  
6 San Francisco, California 94102-3495  
7 Telephone: (415) 436-7200  
8 Facsimile: (415) 436-7027  
philip.kopczynski@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,	)	No. 15-CR-416 WHA
	)	
14 Plaintiff,	)	STIPULATION TO EXCLUDE TIME
	)	UNDER THE SPEEDY TRIAL ACT;
15 v.	)	<del>PROPOSED</del> ORDER
	)	
16 CLAUDIO MACIEL,	)	
	)	
17 Defendant.	)	
	)	

18  
19 **STIPULATION**

20 The United States of America, by and through Special Assistant United States Attorney Philip  
21 Kopczynski, and Defendant Claudio Maciel, by and through his attorney John Forsyth, hereby stipulate  
22 that, with the Court's approval, the time between September 8, 2015 and September 22, 2015 is  
23 excludable under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective  
24 preparation by defense counsel. Defense counsel will use the excluded time to review the discovery

25 ///

26 ///

27 ///

28 ///

STIP. TO EXCLUDE TIME; ~~PROPOSED~~ ORDER  
NO. 15-CR-416 WHA

1 produced by the government.

2 IT IS SO STIPULATED.

3 Dated: September 17, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
PHILIP KOPCZYNSKI  
Special Assistant United States Attorney

6 Dated: September 17, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
JOHN D. FORSYTH  
Attorney for Defendant

**PROPOSED ORDER**

GOOD CAUSE APPEARING, upon stipulation of the parties,


THE COURT FINDS that failing to exclude the time between September 8, 2015 and September 22, 2015 would unreasonably deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

THE COURT FURTHER FINDS that the ends of justice served by excluding the time between September 8, 2015 and September 22, 2015 from computation under the Speedy Trial Act outweigh the interests of the public and the defendant in a speedy trial.

THEREFORE, IT IS HEREBY ORDERED that the time between September 8, 2015 and September 22, 2015 shall be excluded from computation under the Speedy Trial Act.

IT IS SO ORDERED.

Dated: September 18, 2015

  
\_\_\_\_\_  
HON. WILLIAM ALSUP  
United States District Judge